DuPont Haskell Global Centers
for Health and Environmental Sciences
Elkton Road, P.O. Box 50
Newark, DE 19714-0050

07 OCT 29 AM 6:06

October 25, 2007

Via Federal Express

CONTAIN NO CBI

Document Processing Center (Mail Code 7407M)
Room 6428
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Ave., NW
Washington, DC 20460

8EHQ-07-16983

Dear 8(e) Coordinator:

Difluoro (fluorosulfonyl) acetyl fluoride
CAS # 677-67-8

This letter is to inform you of the results of a recently conducted *in vitro* genotoxicity study with the R&D test substance referenced above.

The test substance was evaluated using the plate incorporation method with tester strains *Salmonella typhimurium* TA98, TA100, TA1535, and TA1537, and *Escherichia coli* WP2 *uvr*A in the presence and absence of S9 metabolic activation.

A preliminary toxicity assay was conducted with a dose range of 6.7 to 5000 µg per plate, with the highest dose being the limit dose for this test system. Precipitate was observed beginning at 667 or 1000 µg per plate in the presence of S9 activation. Toxicity was observed beginning at 3333 or at 5000 µg per plate with tester strain TA98.

Based on the findings of the preliminary toxicity assay, the concentrations tested in the mutagenicity assay were 33, 100, 333, 1000, 3333 and 5000 µg per plate. Precipitate was observed beginning at 1000 µg per plate in the presence of S9 activation. No background lawn toxicity was observed but a decrease in revertant counts was observed at 5000 µg per plate with tester strain TA98 in the absence of S9 activation.

Dose-related positive (mutagenic) increase in the number of revertants per plate was observed in the Salmonella tester strain TA1535, and in E. coli WP2 *uvr*A. In TA1535 mutagenic responses were observed at the two highest dose levels in the activated testing condition. Maximum 4.4- and 3.9-fold increases were observed at the next to highest and highest dose levels, respectively. The concurrent positive control exhibited a 3.2-fold increase. No mutagenic response was observed in the non-activated testing condition. In E. coli mutagenic responses were observed on the two highest dose levels in the non-activated testing condition. However, these maximum 4.1- and 2.7-fold increases were lower than the 18.3-fold increase exhibited by the concurrent positive control. No mutagenic response was observed in the activated test condition. No mutagenic responses were observed with tester strains TA98, TA100, or TA1537.

Under these experimental conditions, the findings described above appear to be reportable, based upon EPA's TSCA Section 8(e) reporting criteria.

Sincerely,

A. Michael Kaplan

A. Michael Kaplan, Ph.D.
Director – Regulatory Affairs

8800000000026

AMK/EMD: clp
(302) 366-5260

307716